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July 18, 2023

VIA ECF

Magistrate Judge Steven L. Tiscione
United States District Court
Eastern District of New York
225 Cadman Plaza East, Courtroom N504
Brooklyn, New York 11201

Re: Star Auto Sales of Queens LLC v. Hanie Iskander. *et al.*
Case No.: 1:19-cv-06791-RPK-ST

Dear Magistrate Judge Tiscione:

This firm represents Plaintiff Star Auto Sales of Queens LLC d/b/a Star Subaru ("Plaintiff") in the above-referenced action.

Plaintiff submits this letter in accordance with the Court's July 13, 2023 Order directing Plaintiff to provide a status report.

Today I attempted to reach out to Defendant Hanie Iskander to see if he would be interested in having a discussion to try to resolve this matter. In the event that Mr. Iskander is not interested in discussing same or we are unable to resolve the matter, below is a summary of what remains to be done in discovery.

Unfortunately, Plaintiff has not yet received from the IRS the tax returns for the individual defendants. With regard to the request for tax returns for NV Production, we received a notice from the IRS dated April 6, 2023 stating that it returned a copy of the request for NV Production tax returns to Mr. Iskander and explained to Mr. Iskander why the IRS could not provide the tax returns for NV Production. We have reached out to Mr. Iskander requesting that he provide a copy of this letter, but he refused and stated he would provide it to the Court. To date, we have not seen a copy of the letter and we are unable to ascertain if the tax returns cannot be provided because they were never filed or if there is another reason.

Accordingly, Plaintiff respectfully requests that the Court (1) direct Mr. Iskander to send within one (1) week by email to Plaintiff's counsel a copy of the letter he received from the IRS explaining why the IRS could not produce the requested tax returns for NV Production; and (2) direct Mr. Iskander to provide within thirty (30) days the IRS and/or Plaintiff's counsel with any additional information the IRS requires in order for the IRS to provide NV Production's tax returns to Plaintiff's counsel.

Plaintiff is also waiting for Chase to respond to a subpoena.

Once Plaintiff receives the tax returns, it will finish the deposition of Mr. Iskander and will depose his wife, defendant Nagwa Youseif. Plaintiff also intends to depose several non-parties who were allegedly employed by Mr. Alexander during the period that Mr. Iskander was purportedly providing advertising services for Plaintiff.

Respectfully submitted,

/s/ Jamie S. Felsen

cc: Hanie Iskander a/k/a John Alexander (via email: jalexander@myhst.com and john@nvadvertising.net)